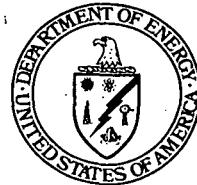


Department of Energy

Ohio Field Office
Fernald Area Office
P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155

3961



01 NOV 2001

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V, SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0031-02

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

REQUEST FOR CONCURRENCE TO INITIATE SOIL STOCK PILES

The purpose of this letter is to request your concurrence for the Department of Energy's (DOE) plan to initiate two stockpiles for organically contaminated soil generated during the remediation of Area 3A. The two piles will be constructed as part of the Corrective Action Management Unit (CAMU) established under the Operable Unit 5 (OU5) Record of Decision (ROD). As described below, the construction and operation of these stockpiles will meet the technical standards for CAMUs established in OAC 3745-57-72 and 40 CFR 264.552.

A stockpile will be situated in the northeastern section of the Stock Pile 7 (SP-7) footprint located north of the former production area and will be given a new designation of Stock Pile AR6-003 (see Attachment 1). The existing SP-7 material will be consolidated in the southwestern portion of the current footprint or removed altogether and sent to the waste pits. To construct the stockpile, the northeastern portion of SP-7 footprint will be excavated to a depth of 18" and a 3' berm will be created utilizing the excavated soil. This new surface including the berm will be lined with a geo-textile, cushioned layer and an 80 mil High Density Polyethylene (HDPE) liner, which will be anchored into the wall of the berm. About 1,700 cubic yards (yd^3) of contaminated soil that is above the On-Site Disposal Facility (OSDF) Waste Acceptance Criteria (WAC) for tetrachloroethylene (PCE) and dichloroethylene (DCE) originating from Area 3A (incinerator pad) will be excavated and stockpiled in this new area. Attachment 2 is a table that describes the chemical characteristics of the material that will comprise the stockpile. The pile will be covered with a 60 mil or greater thickness HDPE and, as well, will be anchored into the berm but at a point lower than that of the liner. By using a cover system in this manner, no precipitation is anticipated to come in contact with the waste and, therefore, no leachate is expected to be generated. Correspondingly, a leachate collection and removal system is

Mr. James A. Saric
Mr. Tom Schneider

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deemed to be unnecessary. All runoff from this area will be directed to the storm sewer inlet already in place. The construction period for this stockpile is anticipated to begin in early November 2001 and will be completed before the 2002 construction season, i.e. April 1, 2002.

About 600 yd³ of soil that has failed the Resource Conservation Recovery Act (RCRA) toxicity characteristic leaching procedure (TCLP) for trichloroethylene (TCE) originating from north of the maintenance building (Bldg. 12) will be excavated and stockpiled in the eastern most Quonset Hut (Bldg. 60). The Quonset Hut will provide the structural integrity for run-on and run-off controls. Enclosure 3 is a table of data that describe the failed TCLP results of the soil that will comprise the pile. This soil represents one of the six potentially characteristic areas that were identified in the OU5 ROD and in the Site-wide Excavation Plan (SEP). Stockpiling the RCRA material inside of the Quonset Hut (Bldg. 60) provides protection from the elements and, therefore, eliminates the need for a leachate collection and removal system. The construction period for this stockpile is anticipated to begin in mid-October 2001 and will be completed this year.

These stockpiles are anticipated to be needed for approximately eighteen months awaiting acceptable treatment methods to be employed. Since remediation wastes managed in a CAMU are not subject to Land Disposal Restrictions (LDRs), these soils will not be included in the FEMP's Federal Facility Compliance Act (FFCA) Site Treatment Plan.

If you have any questions or need further information, please contact Robert Janke at (513) 648-3124.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:R.J. Janke

Enclosures: As Stated

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Mr. James A. Saric
Mr. Tom Schneider

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cc w/enclosures:

R. Greenberg, EM-31/CLOV
N. Hallein, EM-31/CLOV
R. J. Janke, OH/FEMP
J. Reising, OH/FEMP
J. Sattler, OH/FEMP
E. Skintik, OH/FEMP
A. Tanner, OH/FEMP
T. Schneider, OEPA-Dayton (three copies of enclosure)
P. Harris, OEPA/SWDO/DHWM
P. Pardi, OEPA/SWDO/DHWM
G. Jablonowski, USEPA-V, SRF-5J
F. Bell, ATSDR
F. Hodge, Tetra Tech
M. Schupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosures:

D. Carr, Fluor Fernald, Inc./MS2
J. D. Chiou, Fluor Fernald, Inc./MS64
T. Hagen, Fluor Fernald, Inc./MS65-2
S. Hinnefeld, Fluor Fernald, Inc./MS52-2
S. Lorenz, Fluor Fernald, Inc./MS52-5
F. Miller, Fluor Fernald, Inc./MS64
M. Miller, Fluor Fernald, Inc./MS65-2
T. Walsh, Fluor Fernald, Inc./MS46
W. Zebick, Fluor Fernald, Inc./MS64
ECDC, Fluor Fernald, Inc./MS52-7

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Attachment 1

INCINERATOR PAD DATA FROM ABOVE WAC ORGANIC ZONE
DATA FROM APPENDIX C
PREDESIGN CHARACTERIZATION DATA

Parameter	Parameter Average (Counting Non-Detects as Zero)	Minimum Hit	Maximum Hit	# of Borings w/ Hits	Total # of Borings
1,1,1-Trichloroethane	54,545.6 ug/kg	6.8 ug/kg	360,000.0 ug/kg	9	11
1,1,2,2-Tetrachloroethane	- ug/kg	- ug/kg	- ug/kg	0	11
1,1,2-Trichloroethane	2.7 ug/kg	0.8 ug/kg	29.2 ug/kg	2	11
1,1-Dichloroethane	739.8 ug/kg	20.5 ug/kg	5,088.5 ug/kg	7	11
1,1-Dichloroethene	455.7 ug/kg	1.0 ug/kg	4,298.7 ug/kg	16	27
1,2-Dichloroethane	0.9 ug/kg	1.3 ug/kg	9.0 ug/kg	2	11
1,2-Dichloroethene (Total)	89.6 ug/kg	46.7 ug/kg	132.5 ug/kg	2	2
1,2-Dichloroethene(Total)	3,209.2 ug/kg	0.8 ug/kg	39,300.0 ug/kg	11	15
1,2-Dichloropropane	0.3 ug/kg	3.6 ug/kg	3.6 ug/kg	1	11
2-Butanone	0.6 ug/kg	3.1 ug/kg	3.2 ug/kg	2	11
2-Hexanone	- ug/kg	- ug/kg	- ug/kg	0	11
4-Methyl-2-Pentanone	- ug/kg	- ug/kg	- ug/kg	0	11
Acetone	8.5 ug/kg	1.5 ug/kg	68.6 ug/kg	3	11
Aroclor 1254	8.1 ug/kg	23.3 ug/kg	41.5 ug/kg	2	8
Aroclor 1260	- ug/kg	- ug/kg	- ug/kg	0	8
Arsenic	Not Analyzed ug/g dry	- ug/g dry	- ug/g dry	0	0
Benzene	0.3 ug/kg	1.1 ug/kg	2.0 ug/kg	2	11
Beryllium	0.7 ug/g dry	0.5 ug/g dry	1.0 ug/g dry	18	18
BromodiChloromethane	- ug/kg	- ug/kg	- ug/kg	0	11
Bromoform	- ug/kg	- ug/kg	- ug/kg	0	11
Bromomethane	- ug/kg	- ug/kg	- ug/kg	0	11
Carbon Disulfide	0.2 ug/kg	1.7 ug/kg	1.7 ug/kg	1	11
Carbon Tetrachloride	- ug/kg	- ug/kg	- ug/kg	0	11
Chlorobenzene	- ug/kg	- ug/kg	- ug/kg	0	11
Chloroethane	0.1 ug/kg	1.1 ug/kg	1.1 ug/kg	1	11
Chloroform	0.6 ug/kg	6.6 ug/kg	6.6 ug/kg	1	11
Chloromethane	0.6 ug/kg	7.0 ug/kg	7.0 ug/kg	1	11
cis-1,2-Dichloroethene	538.2 ug/kg	81.2 ug/kg	3,657.7 ug/kg	7	10
cis-1,3-Dichloropropene	- ug/kg	- ug/kg	- ug/kg	0	11
Dibromochloromethane	- ug/kg	- ug/kg	- ug/kg	0	11
Ethylbenzene	10.1 ug/kg	1.4 ug/kg	70.0 ug/kg	3	11
Methylene Chloride	457.5 ug/kg	13.6 ug/kg	3,108.0 ug/kg	6	11
Styrene	- ug/kg	- ug/kg	- ug/kg	0	11
Technetium-99	8.6 pCi/g	1.8 pCi/g	22.0 pCi/g	3	3
Tetrachloroethene	68,622.8 ug/kg	3.1 ug/kg	1,100,000.0 ug/kg	22	27
Thorium	5.9 ug/g dry	4.2 ug/g dry	9.1 ug/g dry	22	22
Thorium, Total	4.8 ug/g dry	4.8 ug/g dry	4.9 ug/g dry	2	2
Toluene	88.9 ug/kg	68.8 ug/kg	670.0 ug/kg	3	11
trans-1,2-Dichloroethene	24.7 ug/kg	0.5 ug/kg	225.1 ug/kg	7	10
trans-1,3-Dichloropropene	- ug/kg	- ug/kg	- ug/kg	0	11
Trichloroethene	3,120.2 ug/kg	1.8 ug/kg	40,000.0 ug/kg	22	27
Uranium, Total	35.9 ug/g dry	1.2 ug/g dry	368.8 ug/g dry	24	24
Vinyl Chloride	- ug/kg	- ug/kg	- ug/kg	0	11
Xylenes (Total)	97.4 ug/kg	3.1 ug/kg	548.0 ug/kg	4	11

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Attachment 2

TABLE 2-4
MAINTENANCE BUILDING CHARACTERISTIC AREA
DATA SUMMARY FOR TRICHLOROETHENE

Boring	Depth (feet)	TCLP Result	TCLP Limit
A3-MB01	5-5.5	1.1 mg/L	0.5 mg/L
A3-MB01	6-6.5	1.6 mg/L	0.5 mg/L
A3-MB01	7-7.5	0.53 mg/L	0.5 mg/L
A3-MB02	6-6.5	1.6 mg/L	0.5 mg/L
A3-MB03	5-5.5	1.5 mg/L	0.5 mg/L
A3-MB03	6-6.5	1.8 mg/L	0.5 mg/L
A3-MB03	7-7.5	1.8 mg/L	0.5 mg/L
A3-MB05	2-2.5	1.1 mg/L	0.5 mg/L
A3-MB05	3-3.5	1.8 mg/L	0.5 mg/L
A3-MB05	5-5.5	0.86 mg/L	0.5 mg/L
A3-MB05	7-7.5	0.52 mg/L	0.5 mg/L
A3-MB11	8.5-9	0.65 mg/L	0.5 mg/L
A3-MB14	3.5-4	1.8 mg/L	0.5 mg/L
A3-MB14	4.5-5	3.5 mg/L	0.5 mg/L
A3-MB14	5.5-6	5.3 mg/L	0.5 mg/L
A3-MB16	3.5-4	0.65 mg/L	0.5 mg/L
A3-MB17	4.5-5	1.8 mg/L	0.5 mg/L
A3-MB17	5.5-6	3.5 mg/L	0.5 mg/L
A3-MB17	6.5-7	2.0 mg/L	0.5 mg/L
A3-MB17	7.5-8	1.3 mg/L	0.5 mg/L

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